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CHRISTOPHER J. WHITE, ESQ. cwhite@whitemcspedon.com

February 25, 2025

United States District Court Southern District of New York 40 Foley Square, Room 435 New York, N.Y. 10007 ALCarterNYSDChambers@nysd.uscourts.gov

Attn.: Honorable Justice Carter

Re: The Pan-Albanian Federation of America VATRA (THE HEARTH) Inc. v.

Mirakaj & Lumaj

24-CV-01610 (ALC) Docket #:

Dear Justice Carter:

My firm represents the defendant, Valentino Lumaj, on this matter. On February 25, 2025 we appeared before Honorable Justice Aaron for a settlement conference with all clients present.

Thanks to the efforts of Justice Aaron, we were able to put in place the parameters of a possible settlement but need more time to work out the final details. I have conferred with all counsel and we all respectfully request your Honor stay this matter while we work out the final details of this potential settlement.

This is the first request for a stay on this matter while the parties complete the proper language and parameters for this possible settlement.

We respectfully thank the Court for consideration of this request.

Very truly yours, Christopher J. White Christopher J. White

cc:

Darius Pakrooh, Esq. Pakrooh Law P.C. 90 Canal Street, Suite 400 Boston, MA. 02114 (617) 874-1410 darius@pakroohlaw.com Attorney for the Plaintiff Pan-Albanian

Natraj S. Bhushan, Esq. Turturo Law, P.C. 1361 North Railroad Ave. Staten Island, N.Y. 10306 natraj@turturrolawpc.com (718) 384-2323 Attorney for defendant Mirakaj HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

February 27, 2025 New York, NY

The Court GRANTS the Parties' request for a stay in this case. The Court ORDERS that the case be stayed for 60 days in light of the Parties' settlement discussions.